

# **EXHIBIT 3**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

ALEXANDRIA DIVISION

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ROSY GIRON DE REYES;  
JOSE DAGOBERTO REYES;  
FELIX ALEXIS BOLANOS;  
RUTH RIVAS; YOVANA JALDIN SOLIS;  
ESTABAN RUBIN MOYA YRAPURA;  
ROSE ELENA AMAYA, and  
HERBERT SARAVIA CRUZ,

Plaintiffs,

CASE NO:  
1:16ev00563-TCB

Vs.

WAPLES MOBILE HOME PARK  
LIMITED PARTNERSHIP; WAPLES PROJECT  
LIMITED PARTNERSHIP; and  
A.J. DWOSKIN & ASSOCIATES, INC.,

Defendants,

-----X

DEPOSITION OF MARK ANDREW JONES

Falls Church, Virginia

November 22, 2016

9:30 a.m.

Reported By:  
Chris Fox  
Job No: 47656

<p style="text-align: right;">26</p> <p>1 that they are distinct entities, so you have to be</p> <p>2 careful in asking questions because most of the</p> <p>3 folks are not employees of any entity other than</p> <p>4 the A.J. Dwoskin entity.</p> <p>5 (Deposition Exhibit 4,</p> <p>6 Organization chart</p> <p>7 Marked for Identification)</p> <p>8 BY MS. ODOM:</p> <p>9 <b>Q. Mr. Jones, I want you to take a look at this.</b></p> <p>10 <b>Have you ever seen this document before?</b></p> <p>11 A. Yes, I have.</p> <p>12 <b>Q. Can you tell me what it is?</b></p> <p>13 A. It is an organization chart of the entities.</p> <p>14 <b>Q. And those entities include Waples Mobile Home</b></p> <p>15 <b>Park Limited Partnership?</b></p> <p>16 A. Correct. Waples Project Limited Partnership.</p> <p>17 <b>Q. Um-hmm.</b></p> <p>18 A. And Waples AJD Corp.</p> <p>19 <b>Q. What's the relationship between these</b></p> <p>20 <b>entities?</b></p> <p>21 A. The Waples Project Limited Partnership owns</p>	<p style="text-align: right;">28</p> <p>1 A. No.</p> <p>2 <b>Q. What document would I look to figure that</b></p> <p>3 <b>out?</b></p> <p>4 A. The financial statement.</p> <p>5 <b>Q. Is that publicly available?</b></p> <p>6 A. No.</p> <p>7 <b>Q. Do you know whether it's been produced in</b></p> <p>8 <b>this case?</b></p> <p>9 A. No, it has not.</p> <p>10 <b>Q. Do either Waples Mobile Home Park Limited</b></p> <p>11 <b>Partnership or Waples Project Limited Partnership</b></p> <p>12 <b>receive any federal funding or federal financial</b></p> <p>13 <b>assistance?</b></p> <p>14 MR. DINGMAN: I'm going to object to the</p> <p>15 question, because the financial status or</p> <p>16 background of these entities is not a topic in the</p> <p>17 Notice of Deposition; nonetheless, to the extent</p> <p>18 that Mr. Jones can answer the question, I'll allow</p> <p>19 him to answer based on his personal knowledge, but</p> <p>20 this was not a topic in the corporate deposition.</p> <p>21 BY MS. ODOM:</p>
<p style="text-align: right;">27</p> <p>1 interest in Waples Mobile Home Park LP. So let me</p> <p>2 go -- it's the opposite actually. The Waples Mobile</p> <p>3 Home Park LP owns the Project Limited Partnership,</p> <p>4 Waples Project Limited Partnership which owns the</p> <p>5 asset.</p> <p>6 <b>Q. Okay. And how do those two entities relate</b></p> <p>7 <b>to A.J. Dwoskin &amp; Associates, Inc.?</b></p> <p>8 A. We manage the property or the asset.</p> <p>9 <b>Q. Does A.J. Dwoskin &amp; Associates own an</b></p> <p>10 <b>interest in Waples Mobile Home Park Limited</b></p> <p>11 <b>Partnership?</b></p> <p>12 A. No.</p> <p>13 <b>Q. Does A.J. Dwoskin &amp; Associates, Inc. take a</b></p> <p>14 <b>fee for the management of the assets?</b></p> <p>15 A. Yes.</p> <p>16 <b>Q. How much is that fee on an annual basis?</b></p> <p>17 A. It's -- it is 5 percent of gross revenue.</p> <p>18 <b>Q. Of A.J. Dwoskin's gross revenue?</b></p> <p>19 A. Of Waples' Project.</p> <p>20 <b>Q. Okay. Are you able to estimate that in</b></p> <p>21 <b>dollars?</b></p>	<p style="text-align: right;">29</p> <p>1 <b>Q. You can go ahead and answer, Mr. Jones.</b></p> <p>2 A. No, we have no agreements with federal</p> <p>3 funding.</p> <p>4 <b>Q. Okay. If you look on Exhibit 4 on the</b></p> <p>5 <b>left-hand side, there's Waples/AJD Corp. I'm sorry,</b></p> <p>6 <b>it's a little bit hard to read. It looks like it's</b></p> <p>7 <b>General Partner Interest. How does that fit in with</b></p> <p>8 <b>the other entities?</b></p> <p>9 A. It is an S Corporation that houses the one</p> <p>10 percent GP interest in the Waples Project Limited</p> <p>11 Partnership.</p> <p>12 MS. ODOM: Can you hand me 65, please.</p> <p>13 (Deposition Exhibit 5,</p> <p>14 Notice of Deposition</p> <p>15 Marked for Identification)</p> <p>16 BY MS. ODOM:</p> <p>17 <b>Q. Mr. Jones, if you'll take a look at this and</b></p> <p>18 <b>let me know if you recognize this document?</b></p> <p>19 A. Yeah, I do recognize this document.</p> <p>20 <b>Q. Was this one of the documents you reviewed in</b></p> <p>21 <b>preparing for your deposition today?</b></p>